

Marie-Ann Greenberg, MAG-1284
Marie-Ann Greenberg, Standing Trustee
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SUITE 330
FAIRFIELD, NJ 07004-1550
973-227-2840
Chapter 13 Standing Trustee

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE:
KENNETH LARSEN

Case No.: 21-12639SLM

HEARING DATE: 06/09/2021

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor's proposed plan respectfully objects as follows:

- The plan does not appear to be feasible pursuant to 11 U.S.C. Section 1325(a)(6), as the debtor will be unable to make payments under the plan and to comply with the plan.
- Specifically,
There is no stay in place due to the dismissal of the prior case within one year. In addition, the plan is short due to student loans not being treated outside of the plan, with them at 100% the plan fails.
- Debtor has failed to provide proof of income.
Specifically,
Paycheck for contributing party.

The debtor has failed to provide proof of current income. A paystub from debtor's employer dated no later than two weeks prior to the 341 date must be submitted.

The debtor has failed to provide proof of contribution income. The debtor must submit a certification from the contributor indicating their relation to the debtor and the amount contributed to the debtor's household. In addition, because of the amount of this contribution the contributor must also supply the Trustee with two recent paystubs.
- Co-debtor / non filing spouse has failed to provide proof of income.
Specifically,
Failed to provide proof of current income. A paystub from employer dated no later than two weeks prior to the 341 date must be submitted.
- The Giannetti lien is in Part 4a of the plan which is solely for arrears. It is assumed that the intention is a pay in full of the secured lien which should be addressed in Part 4g. The mortgagee objection must be addressed.

WHEREFORE, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that confirmation of the Debtor's Chapter 13 plan in its present form be denied.

Dated: April 27, 2021

By: /S/Marie-Ann Greenberg
Marie-Ann Greenberg, Esquire
Chapter 13 Standing Trustee